

REMARKS

Applicants request favorable reconsideration and withdrawal of the rejection set forth in the above-mentioned Office Action in view of the following remarks.

Claims 57, 59-65, and 77-86 remain pending, with claims 57, 77, and 86 being independent claims. Claims 57, 64, 65, 77, 85, and 86 have been amended. Support for the amendments and new claims can be found throughout the originally-filed disclosure, including, for example, at page 30, line 21 through page 31, line 8 of the specification. Accordingly, Applicants submit that the amendments do not include new matter.

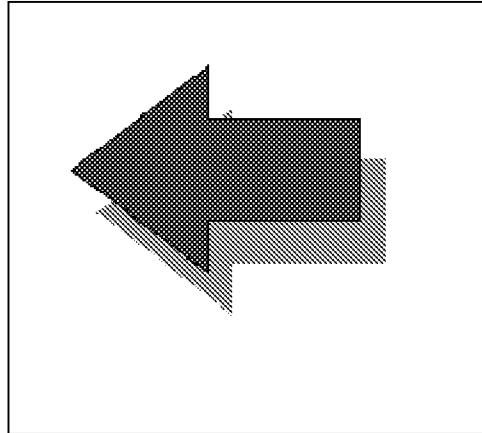
The claims of the application are rejected in the Office Action under 35 U.S.C. § 102(e) as being anticipated by Niwamoto (U.S. Patent No. 6,134,347).

Applicants respectfully traverse the rejection, and submit that the claimed invention is patentably distinguishable from Niwamoto for at least the following reasons.

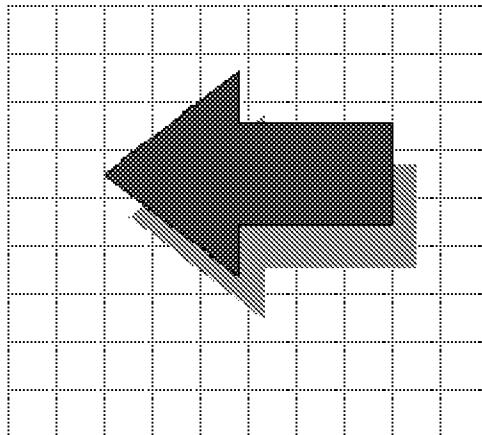
Independent claim 57 recites an image processing system that comprises an image processing apparatus and an image storage apparatus. The image processing apparatus combines material images to generate a mosaic image in imitation of an original image, and includes means for holding scale-down images, division means, determination means, and first output means. In particular, the determination means determines material images and their positions such that material images have color information similar to color information of respective blocks divided from the original image based on the color information of each of the plurality of material images and the color information of each of the plurality of blocks. Independent claims 77 and 86 recite image processing apparatuses that include determination means that are analogous to the determination means recited in independent claim 57.

In order to more clearly understand the claimed invention, Applicants will now provide illustrations demonstrating how the claimed invention could be embodied.

The following may represent an “original image”:



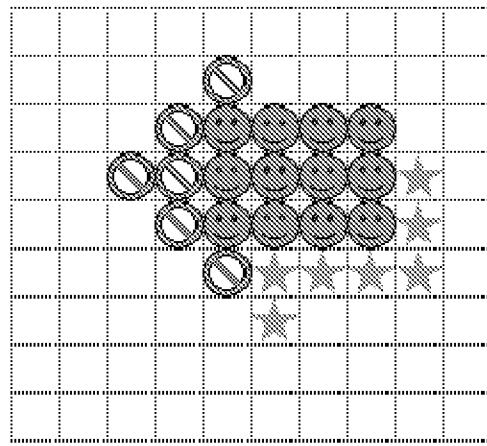
This original image may be divided into a plurality of blocks, as follows:



Further, the following may represent “material images”:



With the foregoing example original and material images, the claimed determination means may select amongst the particular material images for material images that have color information similar to color information of respective blocks divided from the original image based on the color information of each of the plurality of material images and the color information of each of the plurality of blocks. The resulting “mosaic image” may appear as follows:



This resulting mosaic image is different from the original image in detail, but similar to the original image from a distance.

With the claimed invention in mind, Applicants submit that Niwamoto cannot be understood to disclose or suggest an image processing system or apparatus that includes a determination means with the combination of features recited in independent claims 57, 77, and 86.

In Applicants' view, Niwamoto discloses a reduced image filming and compression system. An outline of the system of Niwamoto can be found at column 10, lines 4-22 of the reference. Therein, Niwamoto discloses that a block forming circuit forms blocks from a filmed

image so that adjacent blocks overlap each other at edges of the respective blocks. An image data converter then conducts a linear transform on the image data for each block. Thereafter, a data compression circuit quantizes the DCT coefficients generated by the image data converter, zigzag scans the quantized DCT coefficients, and carries out a run-length encoding and Huffman encoding.

The Office Action cites column 9, lines 28-37 of Niwamoto as disclosing a “determination means” as in the claimed invention. In Applicants’ view, however, this section of Niwamoto merely discloses a block forming circuit that forms blocks so that adjacent blocks overlap each other at edges of the respective blocks, as is described above and as is shown in Figure 2 of the reference. Nothing in the cited section of Niwamoto, or anywhere else in the reference, suggests that the block forming circuit determines “selected material images and their positions such that the selected material images have color information similar to color information of respective blocks divided from [an] original image based on the color information of each of [a] plurality of material images and the color information of each of the plurality of blocks,” as recited in independent claim 57, and analogously recited in claims 77 and 86. In fact, nothing in the passage of Niwamoto cited in the Office Action refers to color information of material images or color information of blocks, let alone the selecting of material images based on a similarity of color information of the material images with the color information of blocks.

Applicants still further submit that Niwamoto fails to disclose or suggest a communication channel between an image processing apparatus and an image storage apparatus, as recited independent claims 57, 77, and 86. For example, in independent claim 57, the image storage apparatus includes storage means for storing the plurality of material images from which the determination means of the image processing apparatus selects based on color information,

with the image storing storage apparatus and image processing apparatus being in communication via the communication channel. Niwamoto does not disclose or suggest such features of the invention.

For at least the foregoing reasons, Applicants submit that Niwamoto fails to disclose or suggest the invention recited in independent claims 57, 77, and 86.

The dependent claims are allowable for reciting features in addition to those recited in the independent claims. Individual consideration of the dependent claims is requested.

Applicants submit that all of the pending claims are allowable over the references of record, and that the application is in condition for allowance. Favorable reconsideration, withdrawal of the rejection, and passage to issue of the present application are earnestly solicited.

Any fee required in connection with this paper should be charged to Deposit Account No. 06-1205.

Applicants' undersigned attorney may be reached in our Washington, D.C. office by telephone at (202) 530-1010. All correspondence should continue to be directed to our New York office at the address shown below.

Respectfully submitted,

/Donald H. Heckenberg, Jr./

Donald H. Heckenberg, Jr.
Attorney for Applicants
Registration No. 60,081

FITZPATRICK, CELLA, HARPER & SCINTO
30 Rockefeller Plaza
New York, New York 10112-3801
Facsimile: (212) 218-2200

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